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OFFICE OF THE
EXECUTIVE SECRETARY
November 15, 2001

David Waddell, Esq.
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

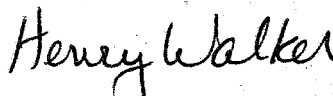
Re: Complaint of BellSouth Telecommunications, Inc. Regarding the
Practices of Global Crossing Telecommunications, Inc. in the Reporting of
Percent Interstate Usage for Compensation for Jurisdictional Access
Services
Docket No. 01-00913

Dear David:

Please accept for filing the original and thirteen copies of the Statement of Issues
filed on behalf of Global Crossing Telecommunications, Inc. in the above-captioned proceeding.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker

HW/nl
Attachment
c: Guy Hicks, Counsel for BellSouth Telecommunications, Inc.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

Re: Complaint of BellSouth)
Telecommunications, Inc. Regarding the) Docket No. 01-00913
Practices of Global Crossing)
Telecommunications, Inc. in the Reporting of)
Percent Interstate Usage for Compensation)
for Jurisdictional Access Services.)

**RESPONDENT GLOBAL CROSSING
TELECOMMUNICATIONS INC.'S
STATEMENT OF ISSUES**

Respondent Global Crossing Telecommunications, Inc., ("Global Crossing") by its attorneys, hereby submits the following statement of issues in response to the Hearing Officer's Scheduling Order dated November 8, 2001.

1. Whether this Complaint must be dismissed because the Authority lacks jurisdiction to hear BellSouth's challenges to Global Crossing's reports of percentage interstate usage;
2. Whether BellSouth's claim must be dismissed because BellSouth has failed to follow the audit procedures specified in its federal and state tariffs;
3. Whether BellSouth's tariffs, the applicable statute of limitations, or the doctrines of waiver, estoppel or laches bar some or all of BellSouth's claims;
4. Whether BellSouth's novel surrogate for determining the jurisdictional nature of traffic pursuant to the separations process can be used to replace the methodology adopted by the FCC in consultation with the Federal-State Joint Board on Separations;

5. Whether BellSouth may disregard the findings of an independent audit commissioned by Global Crossing in compliance with the audit procedures specified in BellSouth's federal and state tariffs;

6. Whether Global Crossing's reported PIUs are consistent with the reporting methodology mandated by the FCC and specified in BellSouth's federal and state tariffs.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____

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Dated: November 15, 2001

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 15th day of November, 2001.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201-3300

Henry Walker
Henry Walker *rx*